

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KEITH I. SCHORR, SUSAN SCHORR, : JURY TRIAL DEMANDED

in their own right and as personal
representatives of the ESTATE OF
RYAN K. SCHORR

: HONORABLE YVETTE KANE

v.

:

Plaintiffs,

:

BOROUGH OF LEMOYNE, et al.

:

Defendants.

:

NO. 1:CV-01-0930

MARY E. D'ANDREA, CLERK

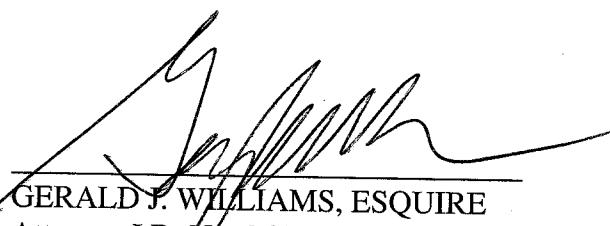
Per

[Signature]
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**PLAINTIFFS' REPLY TO THE MOTION FOR SUMMARY
JUDGMENT OF DEFENDANTS WEST SHORE REGIONAL
POLICE COMMISSION AND CHIEF HOWARD DOUGHERTY**

For all the reasons stated in plaintiffs' accompanying brief, there are ample issues of material facts in plaintiffs' action against moving defendants. Defendants have failed to meet the burden of establishing their right to judgment as a matter of law, and their motion must, therefore be denied.

Respectfully submitted,


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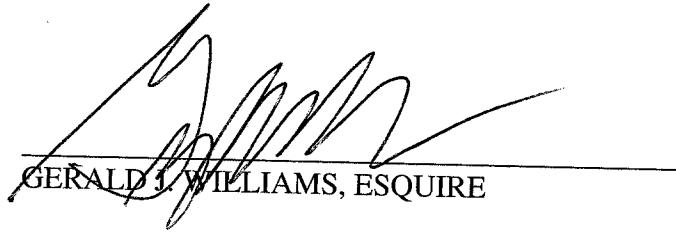
Dated: March 24, 2003

CERTIFICATE OF SERVICE

I, GERALD J. WILLIAMS, hereby certify that on this date I served a true and correct copy of the foregoing Plaintiffs' Reply to The Motion of Summary Judgment of Defendants West Shore Regional Police Commission and Chief Howard Dougherty by first class mail, postage prepaid upon the following counsel:

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GERALD J. WILLIAMS, ESQUIRE

Dated: March 24, 2003